

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Colby School District

Agency Code: 101162

School(s) Reviewed: Colby Elementary

Review Date(s): 11/14-16/16

Date of Exit Conference: 11/16/16

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

Of immediate concern are critical area Performance Standard violations that may result in fiscal action. The identified findings, corrective action required and any documentation needed to demonstrative corrective action was completed are specified.

Please submit corrective action via email, fax or mail prior to the negotiated due date.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the Colby School District staff for the courtesies extended to us during the on-site review. It was helpful to have all of the requested documentation pulled and ready for the review, we also appreciated the work done prior to the review in completing the Off-site Assessment. I hope that you found the time spent in providing technical assistance during the on-site review helpful.

- Thank you for taking the time to attend a few DPI courses this summer! The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI School Nutrition Training webpage dpi.wi.gov/school-nutrition/training.
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI School Nutrition Training webpage dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills.

- Unpaid Meal Charge Policy: USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, to have a **written and clearly communicated** policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the Unpaid Meal Charges In a “Nutshell”: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf> . For a more comprehensive overview, see SP 58-2016: Unpaid Meal Charges Guidance: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-58-2016.pdf>
 - Best Practices
 - Local meal charge policy checklist
 - Sample outstanding balance letter
 - Sample robo-call script

Review Areas

1. **Meal Access and Reimbursement:** Certification and Benefit Issuance, Verification, Meal Counting and Claiming

Comments/Technical Assistance/Compliance Reminders:

Certification and Benefit Issuance

- 289 eligibility determinations were reviewed, only 4 errors were identified.
- Applications and direct certifications were provided within the required 10 operating days from receipt, and often sooner. This means benefits are getting to children very quickly. Excellent job!
- The district has fluid communication with the homeless liaison. Benefits were provided within regulation and in a timely manor.
- Thank you for using the DPI prototype letters with the current non-discrimination statement.

Limited English Proficiency (LEP)

- Application materials and other communications with households concerning eligibility determinations were provided in a language that parents or guardians could understand in order to diminish any language barriers to participation for individuals with limited English proficiency. Great job!
- The FNS website offers the application materials in 49 languages <http://www.fns.usda.gov/school-meals/applying-free-and-reduced-price-school-meals>.
- The nonprofit food service account may be used to pay for translation services for food service purposes if there is a need to translate materials in a language that is not currently available.

Verification/Reporting

- Verification was completed correctly, and on time; along with other October reports like Paid Lunch Price and FNS-10.

Meal Counting and Claiming

- No errors found on the review period (October) claim. Great job!

- Little Stars Pre-K was found to qualify for 2016-17 SY Severe Need Breakfast reimbursement as the lunches claimed in 2014-15 SY are >40% F/R. Please input the 2014-15 SY numbers into the online contract and re-submit. If approved in November, this site can claim Breakfasts' at the higher reimbursement rate. In addition, the agency can retro-claim for one month (October). Please notify your consultant when the contract has been submitted. I will assist in working with our accountant to approve the adjustment.
- Technical assistance was provided onsite to correct an inaccurate point of service at a non-review site (Little Stars Pre-K). Students must be checked off for meals and milk at a qualified point of service, as they receive their meals, where it can be determined they have a reimbursable meal. The Authorized Representative and I discussed having the teachers check off the student's names one at a time, on the paper roster, in the same location as the electronic point of sale. The cashier can then enter the PIN numbers into the computer at the end of meal service on a daily basis.

Findings and Corrective Action Needed:

Certification and Benefit Issuance (BI)

- ❑ **Finding #1:** Student listed on the SFA-1 statistical sample form are incorrectly certified for meals.
 - Four students (1013799674, 1021382124, 1017858799, and 1026032903) were incorrectly certified for free meals due to a state DC match error between 7/1 and 8/10/16. The SFA sent a letter in August notifying the family of the decrease in benefits. However, their status was not changed on the BI list and POS system. The family re-applied via application and was approved for benefits at the reduced level on 11/4/16. The SFA corrected this error on 11/4/16. Fiscal action will be not be assessed.

Corrective Action Needed: Completed Offsite. No further action needed.

Meal Counting and Claiming

- ❑ **Finding #2:** There is an inaccurate point of service for breakfast meals delivered to the Special Education classroom.

Corrective Action Needed: Submit an email statement explaining how the point of service system will be modified so it is taken *as the students receive the breakfast*. Include when and what staff training will be conducted to communicate the new process.

 - The Food Service Director and NPC discussed having the teacher take a student roster down to the classroom as she picks up the breakfast items. She would then mark the students off the list in the classroom as they receive their reimbursable meal and return the list to food service on a daily basis. Food service would then enter the counts into the software system. This is similar to a "field trip" point of service.

5 breakfast meals from 11/15/16 will be disallowed that were entered into the claiming system without an accurate point of service.

2. **Meal Pattern and Nutritional Quality:** Meal Components and Quantities, Offer versus Serve, Dietary Specifications and Nutrient Analysis

Appreciation/Commendations/Noteworthy Initiatives:

Site staff are doing a wonderful job serving healthy meals to students every day. The meals are appealing and a nice variety of fruits and vegetables are offered. The fresh, homemade bread was delicious! Keep up the good work and thanks for all you do!

Comments/Technical Assistance/Compliance Reminders:

Crediting Documentation: Make sure to always keep current, accurate crediting documentation on file, either in the form of paper copies or electronically. A few of the items offered during the week of review did not have adequate crediting documentation submitted, such as some General Mills and Kellogg's grain products served at breakfast. Luckily, General Mills and Kellogg's both post Product Formulation Statements (PFS) online for products commonly used in the school meal programs. The link to this website was emailed to the Food Service Director. Products are reformulated often, so be sure to check at least twice a year that the documentation on file is accurate for the specific products you are receiving.

Crediting: The crediting written on the production records was incorrect or unclear for a few items. Per the Food Buying Guide (FBG), 1 cup of reconstituted tomato soup = $\frac{1}{4}$ cup red/orange vegetable, so $\frac{1}{2}$ cup of soup = $\frac{1}{8}$ cup red/orange vegetable. The crediting of the turkey ham was written in reverse; 1.63 ounces of turkey ham = 1 oz eq meat/meat alternate. The apple crisp credits as $\frac{1}{8}$ cup fruit. The taco shells each credit as 0.25 oz eq grain, meaning that if a student has 2 taco shells on their tray, they do not have a full grain component and therefore the taco shells do not count as a component under Offer versus Serve (OVS).

In-House Yield Study: For items that cannot be credited using the FBG or that you would like to credit differently than the FBG, you may conduct an in-house yield study. It would be a good idea to do this with the carrot sticks that are served, as it was not clear how many carrot sticks = $\frac{1}{4}$ or $\frac{1}{2}$ cup. Detailed information on how to conduct an in-house yield study can be found on our website: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy>.

Findings and Corrective Action Needed:

❑ **Finding #1:** During breakfast observation there was a fair amount of confusion among students about what they were *required* to take under OVS. Many students had to be reminded to take three items including $\frac{1}{2}$ cup of fruit/juice. While all but one student did take reimbursable meals once they were reminded to do so, it is clear that further training or reminders might help make this process go more smoothly. It may be beneficial to conduct a refresher training for staff on what a reimbursable meal looks like, complete with examples for actual breakfasts that you serve. You may also want to post additional signage on the line to remind students what they need to take.

At lunch, there was confusion because the corn and fruit cocktail served on the main line were each $\frac{1}{4}$ cup, so if a student only took one of these, they needed to also take a fruit or vegetable off of the garden bar. Technical assistance was given onsite but after bringing this to the attention of the point of service (POS) staff, some students still left the line without reimbursable meals. It is understandable that there is confusion if on some days, the hot vegetable is served in $\frac{1}{2}$ cup servings, while on others it is served in $\frac{1}{4}$ cup servings.

Communication is key between the servers and the POS staff to ensure that the POS staff knows what a reimbursable meal looks like on any given day.

Non-reimbursable meals: 1 at breakfast, 4 at lunch

Corrective Action Needed:

Please submit a statement describing how you will better train staff and students at the elementary school about OVS requirements for both breakfast and lunch. This may include training, a plan for better communication between staff, signage, etc.

- ❑ **Finding #2:** During the week of review there was a shortage of the bean/pea/legume vegetable subgroup. All grade groups must be offered ½ cup of beans/peas/legumes over the course of the week, but only ¼ cup of refried beans were offered during the week of October 10-14, 2016. There was also a shortage in the dark green vegetable subgroup, as only ¼ cup was offered but ½ cup must be offered over the course of one week.

Corrective Action Needed: Please submit one week of completed production records to show that grades K-5 are offered at least ½ cup of beans/peas/legumes and ½ cup of dark green vegetables.

- ❑ **Finding #3:** Both margarines being used contain trans fat. All foods served as part of the NSLP and SBP must contain 0 grams trans fat.

Corrective Action Needed: Please submit the nutrition facts label for a new margarine containing 0 grams trans fat that you will start serving.

3. Resource Management: Risk Assessment and Comprehensive Review of Nonprofit School Food Service Account, Paid Lunch Equity, Revenue from Nonprogram Foods, Indirect Costs

Comments/Technical Assistance/Compliance Reminders:

- Overall, the district and business manager do a fabulous job tracking expenses and revenues for the school meal programs. Strong internal controls are in place to track sales and revenues received into Fund 50 through the software system and excel tracking sheets. I appreciate the districts' willingness to collaborate specifically on nonprogram food revenue regulations. Completing the ratio tool as part of the offsite assessment and working to track/separate cost. This is a challenging area for not just Colby, but for many districts. I am confident Colby SD will be fully managing nonprogram foods in the coming year.

Annual Financial Report (AFR)

- For the 2016-17 SY under “non-program foods”, SFAs will need to report revenue and expenses separately for any food items served to students that are not claimed as part of the reimbursable meal. A new manual for reporting 2016-17SY Food Service AFR is located on our website: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/annual-financial-report-instructions-new-1617.doc>

Paid Lunch Equity

This looks great! Continue running the tool annually as required. The SFAs current weighted average is \$2.75.

Allowable costs/Indirect Cost

- Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the Indirect Costs guidance <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>.
- DPI does not allow the annual assigned indirect cost rate to be applied to Fund 50 (Foodservice account within WUFAR). For both public and private schools in Wisconsin, any costs assessed to foodservice must be based on documented and justifiable costs for each school building as they pertain to your school situation rather than on the indirect cost rate. This could include items such as utilities, labor, rent, printing and mailing services, administrative oversight, etc.

An example for cost assessed to food service fund may be:

- Labor expenditures based on actual amount of time worked specifically for the purpose of school food service times the employee's wages and benefits; this must be supported by an annual weekly time study.

Revenue from Nonprogram Foods

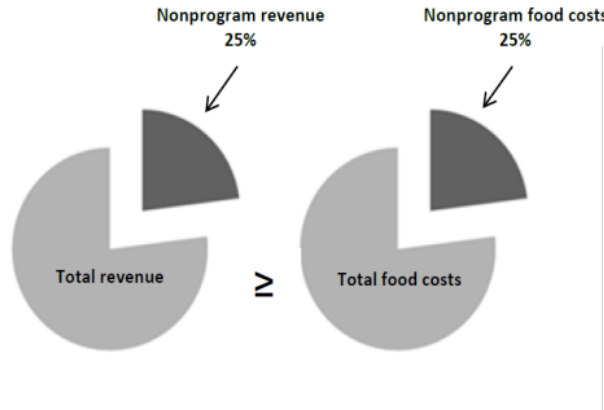
SP-20-2016 <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf>

- Nonprogram foods include any non-reimbursable foods and beverages purchased using funds from the nonprofit foodservice account.
 - Colby SD, at this time, nonprogram foods items include: adult/foster meals sold at \$3.50, caterings, extra milks/milk break sold at \$0.25, extra entrees sold at \$1.00.
- Costs must include: food, labor, equipment, purchased services, and other and must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
 - In evaluating the charges set for extra entrees and adult meals, Colby may find that at the end of the school year, costs exceed revenues generated. I recommend re-evaluating the per service charge of these two items using the DPI Nonprogram food revenue tool and increasing prices as necessary.

Nonprogram food revenue compliance requires all SFAs to:

- Separate nonprogram food costs from program food costs.
 - This is the most difficult part, and requires calculating a raw food cost per serving with the addition of labor, supplies, etc. An industry standard of 38% food cost mark-up can be used to estimate the portion of labor, supplies, etc. rather than conducting a separate time-study. For example, extra entrees: if the average raw food cost is \$0.48 per serving, the recommended charge to cover all cost is \$1.26. The district may wish to charge \$1.25 or \$1.30. It is allowable to show a loss on some items as long as enough revenue is brought in from other items to cover that loss. (e.g., charging less for healthier items, but making up for it in the extra entrée or catering sales).
- Separate nonprogram food revenues from program food revenues. The business manager has a great handle on this.
- Use the USDA Nonprogram Food Revenue Tool http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/npr_tool.xls annually, at a

minimum, to determine if the proportion of nonprogram food revenue to total food service revenue is equal to or greater than the proportion of nonprogram food cost to total reimbursable meal food costs + nonprogram food cost.



- Sufficiently increase nonprogram food prices to cover all costs and comply with the revenue ratio.
 - The DPI Nonprogram Food Revenue tool can be used to assist in setting prices to cover “all cost”. This is located on our website and feeds into the USDA tool to aid in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>
- Adult meals are considered non-program foods. SFAs must, at a minimum, follow the pricing guidelines in Food Nutrition Services Instruction 782-5. A *Wisconsin Adult Meal Pricing Worksheet* has been developed to assist you in pricing adult meals <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>. Districts need to reassess adult meal prices annually prior to contract submission to ensure student reimbursement are not being used to subsidize adult meals. The current reimbursement rates (2016-17 SY) should be used to determine 2017-18 SY prices because rates are not released until after July 1 of each year.
 - This formula above is the minimum pricing guideline, however, it is still highly recommended that districts assess their actual per meal cost to determine if pricing is adequate. For example, per the 2015-16 SY Child Nutrition Program report, Colby’s per meal cost was \$4.16 and the current adult charge is \$3.50, with a large portion of cost from labor. Even if the raw food cost of \$1.38 is plugged into the DPI tool with a 38% food cost mark-up (industry standard to include labor, supplies, etc.), the recommend selling price is \$3.63.

Resources:

- Nonprogram Foods in a nutshell <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>.
- Nonprogram Foods Section on the DPI-SNT Website: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>

Findings and Corrective Action Needed:

Comprehensive Review- Maintenance of the Nonprofit School Food Service Account

- ❑ **Finding #1:** Colby SD is charging secretarial labor/benefits to the food service account (38%), which is not supported by an annual weekly time study.

Corrective Action Needed: Conduct a time study for one week to determine the correct portion of time/benefits that should be allocated to the food service account. Submit the results of this study via email attachment. Moving forward, the time study must be conducted on an annual basis to support the portion of labor as an allowable Fund 50 expense. Depending on the outcome of the study, regulations require the food service account to be reimbursed for the 2015-16 SY and the current SY.

Comprehensive Review- Revenue form Nonprogram Foods

- ❑ **Finding #2:** Unable to fully assess compliance with the revenue ratio requirement. The USDAs Nonprogram Food Revenue Ratio Tool was not completed during the 2015-16 SY, or an equivalent (DPI costing tool). Colby SD worked hard to complete the tool for a current year 5-day reference period prior to the onsite review. However, a few non-program food items (milks, adult meals) and program data are still missing from the calculation. Technical assistance was provided onsite to assist the school in identifying program costs, the raw food cost for adult meals, and an average extra entrée. This tool should be used to assist in setting prices to ensure all costs are covered.

Corrective Action Needed:

- Submit a written statement (email) explaining who will be responsible for completing the nonprogram food revenue tool annually.
- Submit an updated DPI nonprogram food revenue tool which includes: program costs and revenues for the 5-days, extra milk and milk break sold during the 5-days, and the average raw food cost for extra entrees, and adult meals. * The same reference period can be used to complete the tool as was started during the offsite review.
- DPI will work with the SFA to assess the results of the tool and make recommendations accordingly.

4. General Program Compliance: Civil Rights, On-site Monitoring, Local School Wellness Policy and School Meal Environment, Smart Snacks in Schools, Professional Standards, Water, Food Safety, Storage and Buy American, Reporting and Recordkeeping, SBP and SFSP Outreach

Comments/Technical Assistance/Compliance Reminders:

Civil Rights

- The Civil Rights Self-Evaluation Compliance form is required to be completed by October 31 annually. This form is not submitted to DPI, but kept on file at the SFA.

On-site Monitoring

The Administrative Review Final Rule updated 7 CFR Part 220.11(d)(1) establishing the requirement to conduct onsite monitoring of the School Breakfast Program beginning in school year 2016-17. The annual requirement is to annually review 50% of schools approved to participate in the SBP within the jurisdiction of the SFA, with each school in SBP being reviewed once every two years. For more information see USDA memo SP 56-2016 <http://www.fns.usda.gov/sites/default/files/cn/SP56-2016os.pdf>.

The onsite monitoring forms have been updated to include the general areas of review and a new SBP program onsite review form found on our website at: <http://dpi.wi.gov/school->

nutrition/national-school-lunch-program/administrative-review under the SFA onsite monitoring section.

Local Wellness Policy (LWP)

- Special Dietary Needs is a great topic to include in the policy.
- Thank you for providing students with at least 20 minutes to eat from the time they are seated. This will allow students more time to enjoy their food, especially fruits and vegetables that may take longer to eat.

The local wellness policy requirement was established by the 2004 Child Nutrition Programs Reauthorization and further strengthened by the Healthy, Hunger-Free Kids Act of 2010. On July 29, 2016, regulations were finalized to create guidelines for written wellness policies established by School Food Authorities (SFAs). The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-2017 and full compliance with the requirements of the final rule by June 30, 2017.

SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process. In addition, SFAs must designate one or more school officials to ensure each school complies with the policy.

Content of the Policy

At a minimum, the wellness policy must include:

- Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. LEAs are required to review and consider evidence-based strategies in determining these goals. Evidenced based is defined as strategies that have been studied, evaluated, and peer reviewed. At a minimum, USDA FNS expects SFAs to review Smarter Lunchroom tools and strategies. Information on Smarter Lunchroom strategies can be found at: <http://dpi.wi.gov/team-nutrition/smarter-lunchrooms>.
- Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for school meal nutrition standards, and the Smart Snacks in School nutrition standards.
- Standards for all foods and beverages provided, but not sold, to students during the school day.
- Policies for food and beverage marketing that allow marketing and advertising of only those foods and beverages that meet the Smart Snacks in School nutrition standards.
- Description of public involvement, public updates, policy leadership, and evaluation plan.

SFAs must complete an assessment of the policy every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and process made in attaining the goals of the wellness policy. SFAs must make the Triennial Assessment available to the public. In addition, SFAs must make available to the public the wellness policy and any updates to the wellness policy on an annual basis.

Smart Snacks in Schools

There are no competitive foods or beverages sold at Colby Elementary School. The only foods sold that fall under the Smart Snacks rule are parts of the reimbursable meal that are sold a la carte if a student refuses to take a reimbursable meal.

If Colby Elementary starts selling competitive foods/beverages, or if any food/beverage fundraisers are held on the school campus during the school day, the Smart Snacks rule must be followed. You can find more information here: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>.

Professional Standards

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff that must be tracked. Full compliance, great job!

Food Safety, Storage and Buy American

Food Safety Inspections

- Food safety inspection reports must be posted in a place that is visible to the public. The review site's inspection report was moved from inside the prep area at the elementary to outside on the cafeteria wall while onsite. As a reminder, the most recent report must be displayed. Assess other sites within the district for compliance.

Logs

- A sanitizing solution log and test of the appropriate chemical concentration is not being completed at the El school. This is covered within the sites Food Safety plan as SOP#22. Work with your local sanitarian during next food safety review to discuss WI Food Code compliance. <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/stsl.doc>

ShareTables /No Thank You Tables/Donations/Animal Feed

DPI no longer requires the pre-approval of Share Tables, No Thank You Tables, and donations. This change is in response to SP 41-2106, which encourages agencies to support efforts to minimize food waste. However, focus should be first emphasized on source reduction (menu planning/forecasting, Offer vs. Serve, and Smarter Lunchroom techniques). If an SFA chooses to implement any of these options, they are accepting all liability. Schools wishing to utilize any of these options must have a site specific Standard Operation Procedure and must document the leftover items daily <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/monitoring-log-for-no-thank-you-table.pdf>. Leftover items that are considered wholesome may be used at a later meal service, put out the next day in a separate part of the cafeteria as an extra, free item, given out to students later in the day, given to a school nurse to hand out as needed, donated to a charitable organization or composted. Adults may not consume these items. ***Any leftover food cannot be used as animal feed – please contact DATCPFoodMailbox@wisconsin.gov or Heather.Bartley@wisconsin.gov if you have questions about restrictions on using leftovers as animal feed. For more information on Sharing Tables, No Thank You Tables, and donations, please see our food safety website: <http://dpi.wi.gov/school-nutrition/food-safety/>

Milk

Service of milk in coolers, or insulated bags without mechanical refrigeration is allowable when used as intended (frozen inserts and packs). Milk must be monitored to ensure the temperature is kept below 41 degrees Fahrenheit. If the milk is kept below 41 F, the milk can be kept and placed back in a cooling unit for future service. If at any time milk is above 41 F, all milk must be tossed. Consider taping a thermometer inside an insulated milk bag or using a Time Temperature Indicator (TTI). Using milk coolers and bags requires a Standard Operating Procedure be in place. See our food safety website for more information on proper use of milk barrels and bags. <http://dpi.wi.gov/school-nutrition/food-safety/>

Buy American

- The USDA requires that a SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports small local farmers and provides healthy choices for children in the school meal programs. Purchasing from these entities also supports the local economy. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.

The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Further, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.

There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above (“non-domestic”) in circumstances when use of domestic products is truly not practicable.

1. Availability: when the product is not produced or manufactured in the U.S. in sufficient and reasonable available quantities of a satisfactory quality.
 2. Cost: when responses to solicitations reveal that the cost of a U.S. product is significantly higher than the cost of a comparable foreign product.
- Two products were found onsite as non-domestic: Canned Mandarin Oranges “Product of China” and Canned Pineapple “Product of Thailand”. Both fall under these limited exceptions and will need to be tracked.
 - Non-compliant product tracking tool: <http://dpi.wi.gov/school-nutrition/procurement/buy-american>
 - Refer to SP 24-2016 for more information

Reporting and Recordkeeping

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.

SBP and SFSP Outreach

Great job with Summer Outreach! Feel free to access any additional tools to assist in outreach:

- [summer meals locator](#); DPI SFSP Website <http://dpi.wi.gov/community-nutrition/sfsp>
- Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text ‘food’ to 877-877 to locate meals in the area

- USDA Summer Food website <http://www.fns.usda.gov/summerfoodrocks>
- DPI can supply free yard signs, posters, etc. <http://dpi.wi.gov/community-nutrition/sfsp/outreach>

Findings and Corrective Action Needed:

- ❑ **Finding #1:** The Civil Rights Compliance Self-Evaluation from PI-1441 was not completed. This is required annually by October 31. It is not submitted to DPI, but kept onsite.
Corrective Action Needed: Complete the form and address any deficient areas. The form can be located on the DPI-SNT Civil Rights page. Email a copy of the completed form to your consultant as a PDF or Word attachment: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights> <http://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc>
- ❑ **Finding #2:** Colby's Special Dietary Needs forms and local policies state that a *licensed physician* is the only allowable practitioner that can sign off on disabling accommodations.
Corrective Action Needed: Update these forms/policies to include "medical practitioners" defined by Wisconsin State Statute 118.29(1) (e): "Practitioner" means any physician, dentist, optometrist, physician assistant, advanced practice nurse prescriber, or podiatrist licensed in any state. Unless the documentation to support the required dietary accommodation has been signed by one of these practitioners, the school is not required to accommodate the request.
- ❑ **Finding #3:** Employee Health Reporting agreements were not completed/on file for the Ele (review site) staff.
Corrective Action Needed: Complete and submit scanned copies for Elementary staff as an email attachment. <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/employee-reporting-agreement.pdf>.

5. Other Federal Programs Reviews

Commendations

Colby Elementary School is doing a nice job in its first year of FFVP. During observation, most of the teachers were providing education about mangos (where they grow, health benefits, what a whole mango looks like, etc.). It was really nice to see this level of involvement and enthusiasm from teachers. Keep up the good work!

Comments/Technical Assistance/Compliance Reminders:

Fruits and Vegetables: Costs claimed to the grant must be actual costs. A method of tracking cases used for the program needs to be developed to ensure expenses are being attributed to the grant reliably. There should not be any guesswork. While production records are not required for FFVP, consider recording daily production so that you always know exactly how many cases of product were used for FFVP. Some schools record what was used for FFVP directly on the invoices while some keep a separate spreadsheet for tracking.

Entering actual invoice dates on the claim is a best practice and will help with tracking purchases. If a person outside of food service is responsible for doing the claim, it would be helpful for food service to provide the claim preparer with copies of the invoices that show FFVP usage to be claimed or supply the claim preparer with a detailed spreadsheet of expenses to enter.

To better assist with tracking expenses, enter the size/weight of a shipping unit and number of units as listed on the invoice. For example, invoices show the size of grape tomatoes as 12/1 pt and the number of units reflect the number of 12/1 pts purchased. However, the claim shows the unit to be 8 pounds. It may be that a box of 12/1 pts weighs 8 pounds, but recording the size as 12/1 pt to reflect the invoice will increase clarity.

It was noticed that a couple produce items had been entered for less than the invoices reflected and the justification given was that the award had been overspent and the full amounts could not be claimed. If this situation is encountered again in the future, make sure to enter the actual size/weight of the product and the number of products used. The system automatically calculates the price, but you are then able to delete that price and enter any number that is smaller than the calculated price. This will make it easier to validate expenses against invoices. If this situation is encountered again, do not hesitate to contact a FFVP coordinator for further assistance.

Operating Labor: Staff working on FFVP must be able to demonstrate that the amount of time charged to the grant is at least the amount of actual time worked on the grant. Suggested supporting documentation includes a schedule that reflects actual work, personnel activity reports, time sampling, or any type of time tracking system. Not acceptable supporting documentation includes pro-ration based on student population or program budget size, budgeted or projected figures, or percentages written into a position description. For positions that have multiple cost objectives, the question to ask is, “How did we determine that this amount of salary and benefits for this position could be charged to the grant?” The supporting documentation must be such that an individual reviewing it could be reasonably assured that the costs were accurate and properly allocated.

Findings and Corrective Action Needed:

- ❑ **Finding #1:** Documentation provided to validate the September 2016 FFVP claim for Colby Elementary was unreliable. Not all fruit and vegetable costs matched up with invoice cost and an invoice or receipt was not submitted for non-food supplies. Additionally, there was not adequate documentation of operating labor expenses. A total **overclaim of \$6.50** will be reported as fiscal action and subject to the NSLP \$600 disregard as part of Colby School District’s Administrative Review.

Corrective Action Required: Submit an invoice and/or receipt for the non-food supplies claimed in September. This documentation is required to complete the claim validation process. Moving forward, a system for tracking and documenting fruit and vegetables and operating labor expenses will need to be developed. A future claim for FFVP will be validated outside of the Administrative Review process before the claim is paid. It is expected that a tracking system will be worked on during the month of November and will be in place by December. After submitting the December 2016 claim online, submit all supporting documentation to the public health nutritionist. Supporting documentation will include all FFVP invoices and labor reporting that shows a reliable system is now in place to ensure actual costs are charged to the grant.

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called “Agenda 2017”. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in

life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students' success.

For more information on this initiative, please visit the Wisconsin DPI Every Child a Graduate webpage dpi.wi.gov/statesupt/agenda-2017.

